

FILED 24 JUL 23 1041800-DRP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland \_\_\_\_\_ DIVISION

TERA ANN HARRIS

(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:22-cv-01739-MK  
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS (PRISONER COMPLAINT)

JUSTICE CENTER  
MULTNOMAH COUNTY JAIL  
et. al

(Enter full name of ALL defendant(s))

Defendant(s).

Jury Trial Demanded

Yes       No

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: TERA ANN HARRIS

Street Address: 1120 SW THIRD AVE

City, State & Zip Code: Portland, Oregon 97204

Telephone No.: 1212 MESSAGE 503 732-4397

Defendant No. 1

Name: Deputy Polk  
Street Address: 1120 SW 3rd Ave  
City, State & Zip Code: Portland, Oregon 97204  
Telephone No.: 503-988-3689

Defendant No. 2

Name: Deputy Reid  
Street Address: 1120 SW 3rd Ave  
City, State & Zip Code: Portland, Oregon 97204  
Telephone No.: 503-988-3689

Defendant No. 3

Name: Deputy Lovejoy  
Street Address: 1120 SW 3rd ave  
City, State & Zip Code: Portland, Oregon 97204  
Telephone No.: 503-988-3689

Defendant No. 4

Name: Sgt Taylor  
Street Address: 1120 SW 3rd ave  
City, State & Zip Code: Portland, Oregon 97204  
Telephone No.: 503-988-3689

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

SGT Fortanay

1120 SW 3rd Ave  
Portland, Oregon 97204  
503 988-3689

SGT Sakirivanch

1120 SW 3rd Ave  
Portland, Oregon 97204  
503 988-3689

Deputy Lopez

1120 SW 3rd Ave  
Portland, Oregon 97204  
503-988-3689

Deputy Mechanic

1120 SW 3rd Ave  
Portland, Oregon 97204  
503-988-3689

Counselor - Deputy Drake

1120 SW Third Ave  
Portland, Oregon 97204  
503-988-3689

Multnomah County Health  
Department Corrections Health  
1120 SW THIRD Ave  
Portland, Oregon 97204  
503 988-3689

Deputy Jones (Female)  
1120 SW THIRD Ave.  
Portland, Oregon 97204  
503 988-3689

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

EIGHTH AMENDMENT CONSTITUTIONAL RIGHT, FIFTH,  
SIXTH, and FOURTEENTH CONSTITUTIONAL RIGHTS  
and FOURTH AMENDMENT

### III. STATEMENT OF CLAIMS

#### Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

PLAINTIFF WAS CELLED IN CELL FOR A WEEK TO TWO WEEKS WITHOUT ANY DISCIPLINARY WRITEUP OR HEARING WITHIN HOUR OR BEING ABLE TO WALK. WHEN ASKED WHY PLAINTIFF COULD NOT WALK, DEFENDANTS DEPUTY POLK, DEPUTY REID, DEPUTY LOVEJOY, SGT TAYLOR, SGT FORTANAY ALL RAN IN PLAINTIFF CELL SOFTLY AND TWISTED FEET AND ANKLE AND CAUSING PHYSICAL BRUTALITY AND EXCESSIVE FORCE. TO WHERE MY WHOLE BODY, MY NECK, MY SHOULDERS IS IN SEVERE PAIN, AND FINGERS GO NUMB, MY SPINE IS IN SEVERE PAIN FROM RETALIATION AND DISCRIMINATION BECAUSE I AM AN AFRICAN AMERICAN WOMEN.

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Plaintiff was placed in disciplinary status more than several times, without being

CONTINUED

### CLAIM I

Plaintiff was then placed in segregation without disciplinary hearing or write up and was again not able to walk, or shower, or use phone calls. Plaintiff was locked in for about another week in excruciating pain. Plaintiff asked Deputy Mechanics for the nurse. When nurse came Deputy Mechanics pulled razor on Plaintiff because Plaintiff asked when can Plaintiff walk and take a shower then Sgt Fernaly, Sgt Sarkisovich, Deputy Lopaz, John Doe, placed physical brutality and excessive force on Plaintiff and put plaintiff in chair. Sgt Fernaly took Plaintiff feet and twisted it so hard he busted blood vessels I have permanent permanent bruises than Deputy Lopaz. Sgt Sarkisovich placed a chain around my shoulder and arm and snatched and pulled it back to the ceiling to where it felt like something ripped than a John Doe Deputy placed a bag on head and they took me to another segregation in the Basement. Because of Retaliation and Discrimination I had physical Brutality, cruel and unusual punishment placed on me Because I am a BLACK AFRICAN AMERICAN WOMEN

given a hearing and when given a hearing  
for asking when was I going to walk  
days where added that was not suppose  
to be added and in a 6 month Period  
Plaintiff walked a period of 20 hours By Counselor Drake  
causing a Pulmonary Embolism from the  
physical Brutality and cruel and unusual punishment  
because of discrimination and Bias of being a  
AFRICAN AMERICAN WOMEN.

### Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Visitor Disgrees, Nine Doe, John Doe, has  
shown deliberate indifference by reclusive  
measures by not letting me have access to  
visits with my family in person and on  
video visit, and Deputy Jones even went as  
far as not letting me call home and again  
restricting video visits and in person  
visits in a time of death in my  
Family I haven't had a visit in a year in  
a half Being Bias and Discriminatory towards  
me because I AM A BLACK AFRICAN American  
(If you have additional claims, describe them on another piece of paper, using the same outline.)

### CLAIM - III

MULTNOMAH COUNTY Health Department Corrections Health failed to treat Plaintiff with medical care after Deputies exerted Physical Brutality and excessive force when there was a clear sign of bruises on Plaintiffs Body and Legs being swollen from lack of movement and exercise resulting in Plaintiff doing ADL's Basic needs necessities of life and limited use of arm, shoulder, and hand with tingling and numbness of hand, and loss of range of motion and cervical neck pain. Exerting cruel and unusual punishment and medical care and being racially discriminatory. Plaintiff received Pulmonary Embolism by failing to get plaintiff medical treatment this was deliberate indifference and discrimination.

**IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

Yes       No

**V. RELIEF**

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

Plaintiff has suffered physical, mental, and emotional stress, fear, humiliation, anguish, degradation, and pain and suffering.

Plaintiff is seeking 7.5 million in damages.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18 day of July, 2023.

Jesha Ann Harris  
(Signature of Plaintiff)